

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

LAFAYETTE CITY-PARISH	*	CIVIL ACTION NO:
CONSOLIDATED GOVERNMENT	*	6:22-CV-00146
	*	
VERSUS	*	JUDGE JUNEAU
	*	
MORBARK, LLC, W.L. DOGGETT, LLC	*	
d/b/a DOGGETT MACHINERY SERVICES	*	MAGISTRATE JUDGE
and CATERPILLAR, INC.	*	CAROL B. WHITEHURST
	*	
* * * * *		

**RESPONSE TO “REMOVAL ORDER” (DOC. 4)**

NOW INTO COURT, through undersigned counsel, comes defendant Caterpillar Inc. (“Caterpillar”), and in response to the Court’s “Removal Order” (Doc. 4) submits the following:

**1(a). A list of all attorneys now involved in the case and the parties they represent:**

**Representing the plaintiff, Lafayette City-Parish Consolidated Government:**

Michael O. Adley, Esq.  
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**Representing the defendant, Caterpillar Inc.:**

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**Representing the defendant, Morbark LLC:**

Paul M. Lavelle, Esq.  
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**Representing the defendant, W.L. Doggett, LLC:**

Undetermined at this time

**1(b). Copies of all records and proceedings occurring the State Court prior to removal, arranged by order of filing date:**

Attached to this pleading (“State Court Record as of January 21, 2022”).

**1(c). A list of all documents included in the State Court record, arranged by order of filing date:**

- 12/29/21 letter to clerk of court;
- 12/29/21 “Louisiana Civil Case Reporting Civil Case Cover Sheet”;
- 12/29/21 “Petition for Redhibition and Damages”;
- 12/29/21 “Request for Notice of Trial Date, Etc.”;
- 01/18/22 “Notice of Removal of Case to Federal Court,” with exhibits.

**1(d). Certificate by counsel.**

Undersigned counsel certifies that the above constitutes the entire State Court record as of January 21, 2022.

**2. Motions or exceptions pending in State Court at the time of removal:**

None.

**3. Funds being held by State Court for benefit of the litigants:**

None.

/s/ Patrick J. O'Cain

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COUNSEL FOR CATERPILLAR INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing pleading has been served by filing it with the Court's electronic-filing system.

/s/ Patrick J. O'Cain

PATRICK J. O'CAIN